

**REMARKS**

By this Amendment, claims 1, 4, 5, and 7-11 are amended, claims 13-15 are added, and claims 3 and 12 are cancelled, without prejudice or disclaimer of the subject matter recited therein. Therefore, claims 1, 2, 4-11 and 13-15 are pending in this application. No new matter is added. Reconsideration of the application is respectfully requested.

Applicants thank Examiners Pahng and Banks for the courtesies extended to Applicants' representatives during the June 23 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

The Office Action rejects claims 1-3, 5 and 6 under 35 U.S.C. §102(b) over U.S. Patent No. 4,192,467 to Hatanaka. This rejection is moot with respect to canceled claim 3 and is respectfully traversed with respect to the remaining claims.

Claim 1 recites, *inter alia*, a destroy process unit that destroys data stored in an electronic data storage device of an image display member. This feature is described in the specification at, for example, page 6, lines 4-16.

Hatanaka discloses an ordinary document shredder that shreds documents A by a strip cutter 52 and a chip cutter 94. As agreed during the interview, Hatanaka does not teach or suggest that the shredder shreds data stored in an electronic data storage device of an image display member, as recited in claim 1. As such, Applicants respectfully submit that claim 1 is patentable over Hatanaka.

Claims 2, 5 and 6 are patentable at least for their dependency on claim 1, as well as for the additional features they recite.

At least for the reasons above, Applicants respectfully request withdrawal of the rejection under 35 U.S.C. §102(b) over Hatanaka.

The Office Action rejects claims 4, 7, 8, 10 and 11 under 35 U.S.C. §103(a) over Hatanaka in view of U.S. Patent No. 4,931,770 to Abramson. This rejection is respectfully traversed.

Abramson does not overcome the deficiencies of Hatanaka discussed above with respect to claim 1. Therefore, claims 4, 7, 8, 10 and 11 are patentable at least for their dependence on claim 1, as well as for the additional features they recite.

Moreover, Applicants respectfully submit that the alleged motivation for combining Hatanaka and Abramson is improper. For example, claim 4 recites that the destroy process unit applies at least one of electric field and magnetic field to the electronic data storage device of the image display member to destroy the data. The Office Action alleges that claim 4 is an obvious variation of the invention of claim 5. However, the Office Action does not explain why one of ordinary skill in the art would have been motivated to combine the teachings of Abramson with the teachings of Hatanaka. Hatanaka only teaches shredding the document using the strip cutter 52 and the strip cutter 94, which physically cut a prescribed number of sheets into pieces. Hatanaka does not teach or suggest the use of any data or media that requires either an electric field or a magnetic field to destroy the data as recited in claim 4. Thus, the asserted combination appears to be based on impermissible hindsight reconstruction. Therefore, Applicants respectfully request withdrawal of the rejection.

The Office Action rejects claim 9 under 35 U.S.C. §103(a) over Hatanaka in view of U.S. Patent Publication No. US 2003/0234242 to Wang et al. ("Wang"). This rejection is respectfully traversed.

Wang does not overcome the deficiencies of Hatanaka discussed above with respect to claim 1. Therefore, claim 9 is patentable at least for its dependence on claim 1, as well as the additional features it recites.


Moreover, Applicants respectfully submit that the alleged motivation for combining Hatanaka and Wang is improper. Claim 9 recites that the data destroy unit applies an electromagnetic wave to the electronic data storage device to overwrite another data into the electronic data storage device so that the electronic data stored in the data storage device is destroyed. The Office Action alleges that claim 9 is an obvious variation of the invention of claim 5. However, the Office Action does not explain why one of ordinary skill in the art would have been motivated to combine the teachings of Wang with the teachings of Hatanaka. As discussed above, Hatanaka only teaches physically cutting sheets into pieces. Hatanaka does not teach or suggest the use of any data or media that requires an electromagnetic wave to destroy the data stored in the data storage device or that may be overwritten by another data as recited in claim 9. Thus, the asserted combination appears to be based on impermissible hindsight reconstruction. Therefore, Applicants respectfully request withdrawal of the rejection.

Claim 13 recites that the electronic data storage device is a semiconductor device, and claim 14 recites that the semiconductor device is an IC chip. These features are described in the specification at, for example, page 6, lines 4-16. Claim 15 recites that the image display member is printing paper. This feature is described in the specification at, for example, page 5, lines 18-20. Claims 13-15 are allowable at least for their dependence on claim 1, as well as the additional features they recite.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the application are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff  
Registration No. 27,075

Klifton L. Kime  
Registration No. 42,733

JAO:KLK/tls

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**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

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